

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

RIPPY OIL CO.

CIVIL ACTION

v.

NO.: 4:22-CV-00276

ACE AMERICAN INSURANCE CO.,
CHARTIS SPECIALTY INSURANCE CO.,
RISK SPECIALISTS COMPANIES
INSURANCE AGENCY, INC.

UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendants, AIG Specialty Insurance Company (“ASIC”) and Risk Specialists Companies Insurance Agency, Inc. (“Risk Specialists”), through undersigned counsel, respectfully move this Honorable Court for an extension of time to file their reply in support of their memorandum in support of the Motion to Dismiss, or in the Alternative, to Transfer or Stay [R. Doc. 4].

1.

ASIC and Risk Specialists request a thirty (30) day extension of time, up to and including April 29, 2022, to file their reply in support of their memorandum *Motion to Dismiss, or in the Alternative, to Transfer or Stay* [R. Doc. 4].

2.

ASIC and Risk Specialists filed their Motion to Dismiss, or in the Alternative, to Transfer or Stay [R.Doc. 4] on February 1, 2022.

3.

Rippy Oil Company sought extensions of time to file its opposition to the Motion to Dismiss, which undersigned counsel consented to and did not oppose.

4.

On March 23, 2022, after receiving a 30-day extension, Rippy filed a 33-page opposition, with 323 pages of exhibits [R. Doc. 23], to ASIC and Risk Specialists' Motion to Dismiss, or in the Alternative, to Transfer or Stay [R.Doc. 4].

5.

At present, undersigned counsel has two cases scheduled for trial on April 11, 2022 (*Daniel W. Carrier and Kortney T. Carrier v. QBE Specialty Insurance Company*, WDLA No.: 21-790; and *Center for Orthopaedics & Spine v. Blackboard Ins. Co.*, WDLA No.: 20-1644), but regardless, given the extent of the opposition, ASIC and Risk Specialists require additional time to respond to the opposition memorandum.

6.

Undersigned counsel contacted counsel for Rippy, who has consented to the extension.

7.

Good cause exists for this extension. Undersigned counsel and counsel for Rippy have exhibited professional courtesies to each other by not opposing requested extensions of time; the issues presented in the motion and opposition memorandum are complex; and undersigned counsel, as noted above, has two trial scheduled for April 11th.

WHEREFORE, Defendants, AIG Specialty Insurance Company and Risk Specialists Companies Insurance Agency, Inc., pray that this unopposed motion be granted and that AIG Specialty Insurance Company and Risk Specialists Companies Insurance Agency, Inc. be granted an extension of time until April 29, 2022 to file their reply in support of their Motion to Dismiss, or in the Alternative, to Transfer or Stay [R. Doc. 4].

Respectfully Submitted,

/s/ Robert I. Siegel

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Agency, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of March, 2022, I electronically filed the UNOPPOSED MOTION FOR EXTENSION OF TIME with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to counsel for all parties to this proceeding.

/s/ Robert I. Siegel

ROBERT I. SIEGEL